1	PHILLIP A. TALBERT United States Attorney ZULKAR KHAN Assistant United States Attorney 501 I Street, Suite 10-100		
2			
3			
4	Sacramento, CA 95814 Telephone: (916) 554-2700		
5			
6	Attorneys for Plaintiff United States of America		
7			
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10			
11	UNITED STATES OF AMERICA,	CASE NO. 2:24-CR-00242-DAD	
12	Plaintiff,	STIPULATIONS REGARDNG EXCLUDABLE	
13	v.	TIME PERIODS UNDER SPEEDY TRIAL ACT; FINDINGS AND ORDER	
14	ANTHONY CARTER and ISAIAH ROWLAND,	DATE: January 6, 2025 TIME: 9:30 a.m.	
15	Defendant.	COURT: Hon. Dale A. Drozd	
16	Defendant.		
17			
18	STII	PULATION	
19	Plaintiff United States of America, by and through its counsel of record, and defendants, by and		
20	through defendants' counsel of record, hereby stipulate as follows:		
21	1. By previous order, this matter was set for status on January 6, 2025.		
22	2. By this stipulation, defendants now move to continue the status conference until March 3		
23	2025, and to exclude time between January 6, 2025, and March 3, 2025, under Local Code T4.		
24	3. The parties agree and stipulate, an	nd request that the Court find the following:	
25	a) The government has repre	sented that the discovery associated with this case	
26	includes investigative reports and related documents in electronic form includes over 500 pages		
27	of documents, numerous photographs, and multiple video recordings. All of this discovery has		
28	been either produced directly to counsel and/or made available for inspection and copying.		

- b) Counsel for defendants desire additional time to consult with their clients, review the current charges, conduct investigation and research related to the charge, review and copy discovery for this matter, discuss potential resolutions with their clients, and otherwise prepare for trial.
- c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
  - d) The government does not object to the continuance.
- Based on the above-stated findings, the ends of justice served by continuing the e) case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of January 6, 2025 to March 3, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.\( \} 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

///

23 ///

24 ///

25 ///

26 ///

///

28 ///

27

## Case 2:24-cr-00242-DAD Document 51 Filed 01/03/25 Page 3 of 3

1	4. Nothing in this stipulation and order shall preclude a finding that other provisions of the		
2	Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial		
3	must commence.		
4	IT IS SO STIPULATED.		
5			
6	Dated: December 31, 2024	PHILLIP A. TALBERT United States Attorney	
7		Officed States Attorney	
8		/s/ ZULKAR KHAN	
9		ZULKAR KHAN	
		Assistant United States Attorney	
10			
11	Dated: December 31, 2024	/s/ ANDREW FRANCISCO ANDERW FRANCISCO	
12		Counsel for Defendant	
13		ANTHONY CARTER	
14			
15	Dated: December 31, 2024	/s/ DANICA MAZENKO DANICA MAZENKO	
		Counsel for Defendant	
16		ISAIAH ROWLAND	
17			
18			
19		ORDER	
20	Pursuant to the stipulation of the parties and good cause appearing, the status conference		
21	scheduled for January 6, 2025 is continued to March 3, 2025, at 9:30 a.m. and time is excluded between		
22	January 6, 2025, and March 3, 2025, under Local Code T4.		
23			
24	IT IS SO ORDERED.		
25	Dated: January 2, 2025	Dale A. Drogd	
		DALE A. DROZD UNITED STATES DISTRICT JUDGE	
26			
27			
20	I		